

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW MEXICO**

In re: **STEPHEN GUAJARDO**
ROBERTA GUAJARDO-GARCIA
Debtor(s).

Case No. 19-10540-t13

**JASON CLINE, LLC'S RESPLY TO DEBTORS' RESPONSE TO APPLICATION FOR
COMPENSATION BY FORMER COUNSEL JASON CLINE**

COMES NOW Jason Cline, LLC (Jason M. Cline) ("Attorney"), former attorney for the debtor(s), and hereby replies to Debtors' Response to Application for Compensation by Former Counsel Jason Cline. In support of thereof, Attorney states:

1. Attorney filed a fee application on July 1, 2019. Attached to the fee application was an itemized list of services rendered and costs expended during the course of representation of the Debtors. Notice of the fee application was mailed on July 2, 2019 which provided 21 days to object to the fee application.
2. Pursuant to the fee application and the itemization, Attorney earned more than what was requested in fee application. Attorney waived the amount in excess of what was paid as a down payment.
3. Debtors filed a response in opposition to Attorney's fee application on July 25, 2019.
4. Debtors response contains no specific objections to any of the fees or costs requested by Attorney. It contains no basis in law or fact and is therefore frivolous and should be denied.
5. Further, Debtors paid their down payment with a debit card. Debtors have contested this transaction with their bank. Attorney requests that the Court enter an Order requiring Debtors to withdraw the contested transaction with their bank, or in the alternative, pay Attorney directly with any funds that Debtors recovered from their bank as a result of the contested transaction. The total amount being

held because of this contested transaction is \$1,978.13, this consists of the \$1,668.13 requested in fee application and the \$310.00 filing fee.

WHEREFORE, Attorney respectfully requests that the Court enter an Order:

- A. Denying Debtors' Response to Application for Compensation by Former Counsel Jason Cline;
- B. Requiring Debtors to withdraw the contested transaction with their bank for the down payment made to Attorney, or in the alternative, require Debtors to turn over funds received from their bank as a result of the contested transaction in the amount of \$1,978.13 to Attorney;
- C. Allowing, as an administrative expense of the estate, the total amount of \$1,668.13 for the Application Period, less payments totaling \$1,668.13 received from or on behalf of the debtor and/or from the Chapter 13 Trustee, leaving a total outstanding balance of \$0.00; and
- D. For any further relief that the Court deems just and proper.

Respectfully Submitted,

/s/ Jason M. Cline "submitted electronically"
Jason M. Cline
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I hereby certify that on July 30, 2019, a true and correct copy of the foregoing was filed electronically with the Bankruptcy Court in accordance with the CM/ECF system filing procedures for providing electronic service to the parties of record identified with the Bankruptcy Court.

/s/ Jason M. Cline